

EXHIBIT 2

**CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF BRONX**

----- X
SYNCHRONY BANK

Plaintiff,

— against —

ERIKA WILSON,

Defendant(s).

Index No.: 5361/23

ANSWER

----- X
PLEASE TAKE NOTICE that Defendant Erika Wilson, by her attorney, Matthew Schedler, Esq., Of Counsel to Elizabeth Miller, Esq., CAMBA Legal Services Inc., hereby interpose the following Verified Answer to the Complaint:

1. Defendant lacks sufficient information to either admit or deny the allegations in paragraphs 1, 2, and 3 of the Complaint.
2. Defendant denies the allegations in paragraph 4 of the Complaint.
3. Defendant denies the allegations in paragraph 5 of the Complaint.
4. Defendant denies the allegations in paragraph 6 of the Complaint.
5. Defendant denies the allegations in paragraph 7 of the Complaint.
6. Defendant denies the allegations in paragraph 8 of the Complaint.
7. Defendant denies the allegations in paragraph 9 of the Complaint.
8. Defendant denies the allegations in paragraph 10 of the Complaint.
9. Defendant denies the allegations in paragraph 11 of the Complaint.

DEFENSES

First Affirmative Defense

10. The Court lacks personal jurisdiction over defendant because she was not properly served in accordance with C.P.L.R. § 308.

Second Affirmative Defense

11. The plaintiff lacks standing to bring this action.

Third Affirmative Defense

12. The defendant does not owe the debt.

Fourth Affirmative Defense

13. The defendant disputes the amount of the debt.

Fifth Affirmative Defense

14. The defendant is entitled to an offset against the amounts claimed because of plaintiff's failure to mitigate its damages.

Sixth Affirmative Defense


15. The statute of limitations has expired

Prayer for Relief

WHEREFORE, Defendant respectfully asks that the Court:

- A. Dismiss the Complaint in its entirety;
- B. Award defendant's reasonable costs and attorney fees; and
- C. Award such other and further relief as the Court deems just and proper.

Dated: August 21, 2023
Brooklyn, New York

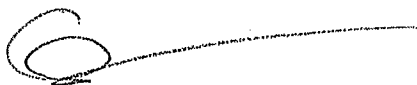


By: Matthew Schedler, Esq., Of Counsel
CAMBA Legal Services, Inc.
Elizabeth Miller, Esq., General Counsel
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matthewsc@camba.org
Attorneys for the Defendant

VERIFICATION

State of New York)
) ss.:
County of Kings)

The undersigned, an Attorney duly admitted to practice law in the State of New York, affirms pursuant to NY CPLR 3020 (d) (3) the following statements to be true under the penalties of perjury: That I am the Attorney of record for Defendant; That I have read and know the contents of the foregoing Answer; That same is true to the knowledge of the affirmant except as to those matters therein stated to be alleged upon information and belief and as to those matters I believe to be true. The reason this verification is made by the affirmant and not the Defendant is because the Defendant does not reside in the county where I maintain an office for the practice of law.


By: Matthew Schedler, Esq., Of Counsel
Elizabeth Miller, Esq., Executive Director
CAMBA Legal Services, Inc.
Attorneys for Defendant
885 Flatbush Ave. 2nd Fl.
Brooklyn, NY 11226
(718) 940-6311
Attorneys for the Defendant

Dated: August 21, 2023
Brooklyn, New York

**CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF BRONX**

Civil Court of the City of New York, County of Bronx,
Index No.: 5361/23

SYNCHRONY BANK

Plaintiff,

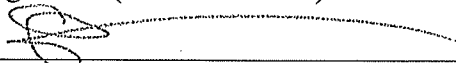
-against-

ERIKA WILSON

Defendant(s).

ANSWER

Signature (Rule 130-1.1-a)



Print name beneath

Matthew Schedler, Of Counsel

Attorney for

CAMBA LEGAL SERVICES, INC.

Elizabeth Miller, Esq., General Counsel

Office and Post Office Address, Telephone

20 Snyder Avenue

Brooklyn, New York 11226

718-940-6311 ext. 79222

To: Selip and Stylianou, LLP
199 Crossways Park Drive
Woodbury, NY 11797
Attorney(s) for Plaintiff

Service of a copy of the within is hereby admitted.
Dated,

Attorney(s) for
